



August 9, 2012

**HIGHLY CONFIDENTIAL VERSION VIA U.S. MAIL
REDACTED VERSION VIA ECFS**

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notification of Substantive and Call Center Changes and Request for Confidential Treatment
Pursuant to 47 C.F.R. § 0.459**

Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.606(f) and 47 C.F.R. § 64.604(c)(5), Snap Telecommunications, Inc. ("Snap"), hereby provides notification of substantive and call center changes, respectively. These changes are the direct result of recent and significant withholdings by the Federal Communications Commission ("Commission") for recovery of past payments for disputed services rendered. The Commission did not negotiate a repayment schedule for such withholdings with Snap, which severely impacted overall VRS operations, necessitating these changes.

Snap reached agreement on August 6, 2012 to transfer its customer, interpreter and network operations to Healinc Telecom, LLC ("Healinc"). Both companies have already begun the process of integrating, transitioning and porting customer ten-digit numbers with associated Snap Ojo and VPAD devices and account-related data onto Healinc's platform. This transition is being carried out so that there are no voluntary service interruptions requiring advance Commission approval. At present, only Snap and Healinc license the same automatic call distribution ("ACD") platform with its associated call management features. This platform is not licensed by any of the other certified VRS companies. The FCC is already aware of the specifications for this platform, having reviewed and granted conditional certification to Snap and Healinc.

Snap customers have been notified of these changes via an e-blast sent out on August 8, 2012, which mentioned choice to either transition or port to another VRS provider. Additional customer notices are planned, with posting of all such communications on the websites of both Snap and Healinc. This integration process is seamless in nature, designed to combine the best of both companies and position Healinc as a larger and stronger entity committed to provision of high quality VRS services to satisfy the current and future needs of transitioned Snap customers – with emphasis on stability, high quality video relay and customer service. To ensure a seamless experience for our customers, this process also involves the transfer of Snap communications assistants, information technology and customer/technical support personnel to Healinc. Attachment A reflects Snap's declaration.

The Commission's rules governing call center reports specifically state that "VRS providers shall ... file written notification with the Commission and the TRS Fund administrator of any change in a center's location, including the opening, closing, or relocation of any center, at least 30 days prior to any such change." Given the aforementioned withholdings, Snap is able to provide partial advance notification. Call center changes are reflected in Attachment B.

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The timetable for final Snap transition to Healinc is projected for August 31, 2012 – other than handling of VRS traffic by Healinc effective August 9, 2012. Accordingly, we wish to ensure – with the support of the Commission and the iTRS Fund administrator – that Healinc will be reimbursed for August 9-30, 2012 traffic picked up from Snap in addition to their own, and then in full on a monthly basis thereafter. Snap does not intend to bill for any August 2012 traffic.

Snap requests pursuant to 47 C.F.R § 0.459 and Exemption 4 of the Freedom of Information Act, that the Commission withhold from any future public inspection and accord highly confidential treatment to the business-sensitive information related to VRS call centers (“Confidential Information”) contained in the unredacted version of this document. All of the Confidential Information has been redacted in this ECFS transmission, with the unredacted version via U.S. Mail.

In support of this request and pursuant to each of the numbered items within Section 049(b) of the Commission’s rules, Snap hereby states as follows:

1. Snap seeks confidential treatment with respect to the Confidential Information in Attachment B, all of which has been redacted in the version filed electronically.
2. Snap is providing the Confidential Information in compliance with Commission rules and regulations.
3. The Confidential Information constitutes sensitive information about Snap call center locations and contact particulars.
4. The Internet-based Telecommunications Relay Service market is highly competitive throughout the U.S.
5. Disclosure of the Confidential Information would result in harm as such would provide Snap’s competitors with insights into its call center operations.
6. Snap does not make the Confidential Information publicly available.
7. Again, Snap does not make the Confidential Information publicly available.

In accordance with the Commission’s *Second Protective Order* (DA 12-402) released May 31, 2012, this letter along with Attachment A, and a redacted version of Attachment B are attached. Confidential copies of these documents, including the non-redacted version of Attachment B have been sent via U.S. Mail and electronic mail to Gregory Hlibok, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, SW, Room 3-B431, Washington, DC 20554.

If there are any questions regarding the above, please do not hesitate to contact me.

Sincerely,

/s/
Nancy J. Bloch
Chief Regulatory and Compliance Officer
Snap Telecommunications, Inc.
443-438-1321 V/VP
nbloch@snapvrs.com

Attachment A (Declaration of Chief Executive Officer)
Attachment B (Marked as Redacted – for Public Inspection)

cc: Thomas W. Kielty, President and Chief Executive Officer, Snap Telecommunications, Inc. (via email)
Lamar Stewart, Chief Operating Officer, Healinc Telecom, LLC (via email)
David W. Rolka, President, Rolka Loube Saltzer Associates (via email)
Gregory Hlibok, Chief, DRO, Consumer & Governmental Affairs Bureau/FCC (via email)



Attachment A

Declaration of President and Chief Executive Officer

Snap Telecommunications, Inc.

I swear under penalty of perjury that I am Thomas W. Kielty, President and Chief Executive Officer of Snap Telecommunications, Inc., an officer of the above-named entity, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided, and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

A handwritten signature in black ink, appearing to read "Kielty", written over a horizontal line.

Thomas W. Kielty
President and Chief Executive Officer
Snap Telecommunications, Inc.
Two Blue Hill Plaza, Third Floor
P.O. Box 1626
Pearl River, New York 10965

August 8, 2012

REDACTED – FOR PUBLIC INSPECTION



ATTACHMENT B

NOTIFICATION OF CALL CENTER CHANGES

*****REDACTED*****